

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE

KRYSTYNNA WINKOWSKI,

Plaintiff,

v.

HOSPITAL AUTHORITY OF THE  
METROPOLITAN GOVERNMENT OF  
NASHVILLE AND DAVIDSON COUNTY  
d/b/a NASHVILLE GENERAL  
HOSPITAL AT MEHARRY,

Defendant.

No. 3:14-CV-1177

Judge Haynes

JOINT MOTION TO CONSOLIDATE

Plaintiff, Krystynna Winkowski, and Defendant, the Hospital Authority of the Metropolitan Government of Nashville and Davidson County ("Defendant"), respectfully move to consolidate this action with Case No. 3:13-cv-0815, *Lucius High & Carla Hilgert v. Hospital Authority of the Metropolitan Government of Nashville & Davidson County*. The *Lucius High* lawsuit ("Case No. 13-815") was filed on August 13, 2013, and a case management order was subsequently entered. The case was thereafter conditionally certified as a collective action under the Fair Labor Standards Act, 29 U.S.C. §§ 201 *et seq.*, by agreement of the parties.

Ms. Winkowski did not file a notice opting in to the collective action in Case 13-815 and, instead, filed a separate lawsuit. Because her allegations arise from the same policies and practices at issue in the *Lucius High* lawsuit, and the Defendant and legal claims at issue are the same, consolidation of this case with the earlier-filed case will advance the interest of judicial economy. Accordingly, the parties request that this case

*ON FILE*  
*This action is*  
*TRANSFERRED to the*  
*Nashville Clerk*  
*Transfer for*  
*other*  
*proceedings*  
*7-21-14*